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*Attorneys for Defendant*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

Echo & Rig Sacramento, LLC, individually  
and on behalf of all others similarly  
situated,

*Plaintiff,*

v.

AmGUARD Insurance Company,

*Defendant.*

Case No. 2:23-cv-00197-DJC-JDP

**Stipulation and Order for  
Continuance of August 31, 2023, Hearing**

WHEREAS, on May 4, 2023, Defendant AmGuard Insurance Company filed a Motion to Dismiss the First Amended Complaint (Dkt. No. 23);

WHEREAS, the briefing on Defendant's motion is complete and a hearing on the motion is currently scheduled for this Thursday, August 31, 2023;

WHEREAS, Rick Lyon, lead counsel for Plaintiff who will be arguing on behalf of Plaintiff, has come down with Covid-19 and is unable to attend a hearing on this Thursday, August 31, 2023;

WHEREAS, Elizabeth Argento, Relief Courtroom Deputy, provided counsel with the Court's next available hearing dates;

WHEREAS, counsel for Plaintiff and Defendant have conferred and both parties are available on September 28, 2023, at 1:30 PM;

NOW, THEREFORE, the parties stipulate to a continuance of the hearing, subject to the Court's approval, to September 28, 2023 at 1:30 PM.

Dated: August 29, 2023

Respectfully submitted,

DOVEL & LUNER LLP

By: /s/ Richard Lyon

Richard Lyon

*Attorneys for Plaintiff Echo & Rig  
Sacramento, LLC*

Dated: August 29, 2023

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Deborah L. Stein

Deborah L. Stein

*Attorneys for Defendant AmGuard Insurance Company*

**ORDER**

Dated: August 29, 2023

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE

**ATTESTATION**

I, Richard Lyon, am the ECF User whose identification and password are being used to file this Joint Statement Identifying Case Type. I attest that Defendant's counsel gave me permission to file this document on Defendants' behalf.

Dated: August 29, 2023

By: /s/ Richard Lyon